

# EXHIBIT T

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)  ECF Case
This document relates to:  <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN)  ECF Case

**DECLARATION OF GENOVEVA “JENNY” FERNANDEZ**

I, Genoveva “Jenny” Fernandez, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of U.S. citizenship.

3. On September 11, 2001, I was present at Two World Trade Center (the “South Tower”) in New York City when the terrorist attacks of the World Trade Center Towers occurred.

4. At the time of these attacks, I worked as a secretary for the New York Housing Authority, and my office was located within the South Tower. Attached as Exhibit B to this Declaration is a true and correct copy of a letter from the New York Housing Authority confirming my employment on September 11, 2001.

5. On the morning of 9/11, I commuted on the Number Four bus to the World Trade Center area. I then proceeded on foot towards the South Tower. As I moved closer to the South Tower, I saw a horrific scene at the North Tower. I saw that a passenger jet had crashed into the

upper section of the North Tower. I saw smoke and flames shooting from the North Tower and people jumping to their deaths to avoid the flames. The scene looked like a war zone around the North Tower.

6. Despite the scene at the North Tower, I then entered the lobby of the South Tower to make my way to my office. At that point, I heard a horrible rumbling sound, and then an incredible explosion blew me backwards onto the lobby floor of the South Tower. I later learned that a second passenger jet had crashed into the upper section of the South Tower, and a massive explosion had rocked the building. As building debris collapsed into the lobby area all around me, I became trapped underneath a huge pile of concrete and rubble.

7. As I lay trapped in the South Tower lobby area under the pile of building rubble, I became surrounded by a thick cloud of dust, building debris, and noxious chemicals. I inhaled large quantities of these hazardous substances into my lungs and airways over the next several minutes as I remained trapped in the rubble. Further, I suffered bruises, scratches and cuts to my legs, arms, and face as a result of being crushed by the building debris.

8. After remaining trapped in the South Tower lobby under the building debris for a long period of time, someone finally rescued me from under the rubble. While gasping for air and despite my various injuries, I then managed to escape from the area with the help of a group of people. After I escaped the tower, an ambulance transported me to a nearby hospital where I was treated for my various injuries.

9. In the course of these terrorist attacks and my escape from the area, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was forever altered.


10. As a result of these terrorist attacks on September 11, 2001, I suffered multiple injuries. Due to the vast amounts of chemicals, smoke, dust, and building debris that I inhaled while trapped in the South Tower lobby and at Ground Zero, I suffered from and continue to suffer from a chronic cough, chronic sinusitis, nose bleeds, chronic asthma, chronic gastritis, GERD, sleep apnea, and other lung and respiratory problems. Further, due to the injuries to my lower body from the crush of the building debris, I now suffer from inflammation, thrombosis, and other vascular issues with my left leg. As referenced above, I also suffered multiple bruises, scratches, and cuts to my legs, arms, and face as a result of being crushed by the building debris. Finally, I have been deemed totally and permanently disabled due to my experiences on 9/11 as described above.

11. I suffered, and continue to suffer, from severe PTSD and severe emotional distress as a result of these World Trade Center terrorist attacks. My enjoyment of life is greatly compromised as I suffered, and I continue to suffer, from severe depression and insomnia as a result of my experiences on 9/11.

12. I sought medical attention for my physical and emotional injuries following these horrific terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select, relevant medical records related to the treatment that I received following the September 11th terrorist attacks.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 20 day of May 2021.

  
GENOVEVA "JENNY" FERNANDEZ

**EXHIBITS  
FILED  
UNDER SEAL  
(ECF No.  
5716)**